

# BRACEWELL

**MEMO ENDORSED**

October 21, 2021

Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

USDC SDNY  
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VIA ECF

Re: United States v. Ciminelli, S2 16 Cr. 776 (VEC)

Dear Judge Caproni:

Louis Ciminelli is currently scheduled to surrender to a designated facility “not later than noon, sixty (60) days after the mandate issues on his appeal.” At my request, the Court has recommended that he be designated to FMC Devens in Massachusetts. I write now to ask that the designation be modified to the Satellite Camp at USP Tucson. Mr. Ciminelli’s wife is spending the majority of her time in Arizona, and therefore visitations will be easier at the Tucson facility. Moreover, Mr. Ciminelli’s doctors at the Mayo Clinic believe that he can be housed at a prison camp and does not need a medical facility. The government (AUSA Matthew Podolsky) has no objection to this proposed modification.

I thank the Court for considering this request.

Respectfully submitted,

/s/ Paul Shechtman

Paul Shechtman  
Partner

PS:wr  
cc: AUSA Matthew Podolsky

Application GRANTED. The Court will request that Mr. Ciminelli be designated to USP Tucson's Satellite Camp. Further requests for a change in the Court's recommendation will be not be entertained.

SO ORDERED.



10/21/2021

**Paul Shechtman**  
Partner

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**HON. VALERIE CAPRONI**  
**UNITED STATES DISTRICT JUDGE**